

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

LUTHER GRAHAM,

Plaintiff,

v.

MONMOUTH COUNTY BUILDINGS AND  
GROUNDS, DAVID KRYZANOWSKI,  
ROBERT W. COMPTON, and CRAIG  
BELL,

Defendants

*Civil Action*

DOCKET NO. 16-1578(PGS)(LHG)

**NOTICE OF CROSS MOTION FOR SUMMARY  
JUDGMENT**

To: Christine Burke, Esq.  
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**PLEASE TAKE NOTICE** that on a date and time to be determined by the court, or as soon thereafter as counsel may be heard, the undersigned attorneys for Defendant, Monmouth County Buildings and Grounds and Defendant Robert Compton, will cross-move before the United States District Court, District of New Jersey, Clarkson S. Fisher Building and U.S. Courthouse, 402 East State Street, Trenton, New Jersey, for an Order granting summary judgment to Defendant, County of Monmouth, together with any other relief the Court deems equitable and just.

**PLEASE TAKE FURTHER NOTICE** that Defendant will rely upon the accompanying brief and declaration in support of the within motion.

**PLEASE TAKE FURTHER NOTICE** that Defendant requests oral argument if opposition is filed or in the discretion of the Court.

A proposed form of Order is attached hereto.

Respectfully submitted,  
Kenney, Gross, Kovats & Parton

A handwritten signature in blue ink, appearing to read 'Dan A', is written over a light blue rectangular background.

DANIEL R. ROBERTS

CLEARY GIACOBBE ALFIERI JACOBS, LLC

/s/ Micci J. Weiss  
MICCI J. WEISS

Dated: November 15, 2019